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Narrative Statement  
Application for Regulated Wetlands Activity  
Fintech Village, LLC  
Library Building  
Demolition, Erosion & Sedimentation Control & Soil Remediation  
1800 Asylum Avenue  
West Hartford, Connecticut  
DPI Project No. 2815.B  
December 13, 2019

Bestech, Inc. (Applicant) of Connecticut has been retained by Ideanomics, LLC (Property Owner) of New York to perform environmental and demolition services at the proposed mixed-use campus known as “Fintech Village”, located at UConn’s former West Hartford campus adjacent to Trout Brook Drive and Asylum Avenue. For the third wetlands application in the demolition series, the applicant is requesting approval to demolish in its entirety the former Library building at 1800 Asylum Avenue. The three-story brick building with a full basement on the south end of the campus (parallel to Asylum Avenue) is contaminated with asbestos and PCBs. Bestech, a Connecticut-licensed environmental abatement and demolition contractor, is also requesting approval to remove PCB-contaminated soil around the periphery of the building. This demolition will follow the same protocols as those for the approved Social Work Building demolition (IWWA #1115). The firm has recently completed an asbestos abatement phase for the interior of the structure. These are all necessary elements to facilitate development of Ideanomics’ Fintech Village campus.

Bestech is abating and removing contaminated buildings and soil pursuant to environmental reports and investigations performed by Eagle Environmental, Inc., and in accordance with plans and procedures in close consultation with the Connecticut Department of Energy & Environmental Protection and the United States Environmental Protection Agency. A representative of Eagle Environmental expressed email confirmation that neither the DEEP (August 20<sup>th</sup>) or EPA (August 22<sup>nd</sup>) had any further comments about the contractor work plan provided in this application; documentation of that written approval was provided to Design Professionals, Inc. by James Newbury, President, Bestech, Inc. on October 7, 2019 (see Appendix item number 8 for reference). No additional documentation from the DEEP or EPA has been provided in reference to the most recent work being completed on site. Communication between Bestech, Inc. and the agencies has been frequent and will be submitted to the town for record upon receipt by the applicant.

The subject tract, owned by Fintech Village, LLC., has 33.9 acres, and wetlands were previously determined by Milone & MacBroom, under contract with the Town of West Hartford. A Fintech Village wetlands consultant, All Points, concurs with that determination as told to Design

Professionals, Inc. with no documentation provided. Ideanomics, through Bestech, has also retained Design Professionals, Inc. (DPI) to perform civil engineering design services associated with this application, as well as JMM Wetland Consulting Services, LLC (JMM), to perform wetland and erosion control advisory services.

As depicted on DPI's engineered site plan dated December 4, 2019, Bestech will be completing work in an area encompassing 52,511 square feet, of which 27,028 square feet is within the 150 feet upland review area and 407 square feet is within the adjacent wetlands. The building occupies 20,536 square feet within the limits of construction activity and only 8,717 square feet of that ground disturbance is in the upland review area. That building area has been counted in the overall disturbance area due to the demolish of the basement. With that, the total 27,435 square feet is disturbance directly associated with the removal of the building and contaminated soil and construction activity around the contaminated zones. The volume of soil to be removed from the site is 318± cubic yards at depths ranging from 1 foot to 2 feet. Of that total, 208± cubic yards are being removed from the regulated upland review area also at depths ranging from 1 foot to 2 feet and 35± cubic yards are being removed directly from the wetlands only at a depth of 1 foot. The area to be removed at each respective soil depth is outlined on the Eagle Environmental Library Building PCB Soil & Hardscape Remediation plan on page PCB-3, included in this application.

As mentioned above, there is a limited temporary disturbance to the wetlands to the west of the site activity. The existing condition of this wetland area is a mowed wet meadow, which is relatively flat but slopes gently down towards the building in the area of proposed disturbance. The wetlands easterly of the activity area is a pond and is not being directly impacted by this work. In order to protect these regulated areas, proper erosion control measures have been recommended by JMM in his E&S Recommendations report dated December 11<sup>th</sup>, 2019. Given the uphill nature of the adjacent wetlands, JMM has recommended 171 lineal feet of typical silt fence adjacent to the westerly wetland boundary, as well as an adjacent 12" entrenched excelsior wattle system filled with wood fiber, to be installed on the building side of the silt fence. These measures ensure the prevention of fine-textured soils from migrating to the regulated wetland outside of the work area. There will be a minor intrusion by the silt fence into the wetlands, as depicted on the Erosion and Sedimentation Control Plan prepared by Design Professionals, Inc. dated December 4<sup>th</sup>, 2019. Our recommendation supported by JMM includes an appropriate wetland remediation seeding mixture to be seeded in the area of minor intrusion mentioned above. Any disturbed area will be seeded per the DPI plan and details until exposed soils in the wetlands are stabilized with a vegetation cover.

To supplement the measures recommended by JMM, additional typical silt fence is proposed along all limits of construction activity that are down slope from the building. A total of 804 linear feet of silt fence can be found documented on DPI plan set page C-ES1 with construction details on page C-ES2. These measures will act to prevent the migration of fine textured soils beyond the work limit on all remaining sides of the library. Additional measures taken by Bestech's activities are defined in their Demolition, Erosion Control and Soil Remediation Work Plan to diligently monitor these measures, appended herewith along with JMM's report.

Due to the health and safety concerns for both human and non-human ecosystems, there is no alternative to the building demolition and soil removal since contaminants must be removed. Indeed, the Connecticut DEEP has a Notice of Violation (NOV) on the site that stems from the PCB's washing off the window caulking over the years and into the soil (see 11-18-19 Fintech

Village, Executive Summary by Bestech). This application provides the highest level of environmental responsibility, protection, and remediation of all surrounding wetlands, watercourses, and upland review areas given the lack of alternatives.

Given the similar nature of this application to that of the approved work for the School of Social Work building also on site, an engineered site plan (dated 12-4-19) is provided to address erosion and sedimentation control measures. We offer an additional summary of interventions included in the site plan and other attached documents: 1) Bestech will be exposing selected catch basins under the plastic sheeting/plywood around the building in order to facilitate drainage flow. Each catch basin will be protected with silt sacks and haybales, which is depicted on the site plan. Jim McManus of JMM previously concurred with these measures; 2) Building roof leaders will be plugged prior to demolition and soil remediation; 3) The temporary diversion swale detail on sheet C-ES2 is only depicted in the event it is necessary; 4) The existing chain link construction fence and proposed silt fence around the work area will remain in place until a site plan has been approved and construction begins for the Fintech Village campus; 5) Prior to dewatering activities, the water will be tested by Eagle Environmental for contaminants. If test results determine the water is clear of contaminants, it will be released to the ground through a silt sack. If test results do not approve the release of water to the ground, the water will be pumped through a filter system to remove any asbestos or PCBs and funnel those contaminants into an adjacent tank. The water will be retested, and the process will continue until it is confirmed for discharge to the existing drainage system; 6) Contaminated material will be temporarily stockpiled on site in the locations provided in Bestech's attached Work Plan. As outlined in that work plan, excavated material will be loaded into haul trucks and transported to the designated stockpile area. A sketch is provided showing the construction of the stockpiles for safe, temporary storage until the material is removed from the site. Once the material is properly sampled and approved for transportation, it will be loaded into alternative hauling vehicles and moved to the appropriate disposal facilities out of state; 7) Vegetation in the contaminated area will be removed as if it were contaminated, with the exception of tree trunks and branches; 8) All equipment decontamination will be undertaken at the completion of the soil remediation in locations specified on Bestech's attached Work Plan; 9) The DPI site plan indicates holes left as a result of soil removal will be shaped to OSHA standards (maximum 2:1 slopes, maximum depth 6 feet), and the building slab will remain as is. This is expected to be a temporary condition; 10) Vehicle anti-tracking pads are provided per Bestech's recommendations to ensure the movement of all hauling machinery occurs on control hardscape areas.

Eagle Environmental will have staff on site during the duration of Bestech's abatement, remediation and demolition activities. Part of their assignment will be to monitor the condition and performance of the erosion and sedimentation control measures, weekly and immediately following storm events.

In conclusion, the permitted activities will serve to clean up the contaminated former UConn campus in preparation for development of Ideanomics' mixed-use Fintech Village. These activities will both limit and prevent impacts to the adjoining wetlands. All abutting property owners to this project have been listed on the appended site plan set and will be contacted by the Town regarding this application and activity. This document references the scope of work provided in Section 7.5 of the Town of West Hartford Inland Wetlands and Watercourses Regulations for an application for regulated wetlands activity. The appendix below lists all additional documents to be used in review of this application.

## Appendix

- 1) Library Building Demolition Site Plan set, dated 12/4/19; prepared by Design Professionals, Inc.
- 2) Topographic Survey, dated 5/30/19; prepared by Langan CT, Inc.
- 3) Wetland Delineation, dated 7/10; prepared by Milone and MacBroom
- 4) Fintech Village, Asbestos Abatement, Demolition, PCB Soil Remediation, Executive Summary to Todd Dumais, dated 11/18/19; prepared by James Newbury, President, Bestech, Inc.
- 5) Work Plan for the Soil/Hardscape Remediation of the Social Work, Library, and Undergraduate Buildings (applicable sections), dated 11/18/19; prepared by Bestech, Inc.
- 6) Site Visit, E&S Recommendations (including site photos), dated 12/11/19; prepared by JMM Wetland Consulting Services, LLC
- 7) Eagle Environmental, Inc. Supplemental Documents
  - a. Self-Implementing PCB Cleanup and Disposal Plan, dated 5/1/19
  - b. PCB-3: Library Building PCB Soil & Hardscape Remediation Plan, dated 5/1/19
  - c. P-3: Library Building Soil Photos, dated 5/1/19
- 8) CT DEEP & EPA email “approval” of Fintech Village work plans, dated 8/20/19 and 8/22/19; provided by Eagle Environmental, Inc. (additional “approval” not available at time of application)
- 9) Asylum Avenue, West Hartford, CT Soil Map and Report, analysis run on 9/27/19; prepared by Design Professionals, Inc. via USDA Web Soil Survey